

Marshall C. Turner  
HUSCH BLACKWELL LLP  
190 Carondelet Plaza, Suite 600  
St. Louis, MO 63105-3433  
(314) 470-1500 (Telephone)  
(314) 480-1505 (Fax)  
e-mail: marshall.turner@huschblackwell.com

Obj. Deadline: March 15, 2019 @ 4:00 pm ET  
Hearing Date: March 21, 2019 @ 10:00 am ET

*Attorneys for WC Independence Center, LLC*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re	x	
	:	Chapter 11
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	:	
	:	Case No. 18-23538 (RDD)
Debtors. <sup>1</sup>	x	(Jointly Administered)

**NOTICE OF HEARING ON MOTION OF WC INDEPENDENCE CENTER, LLC FOR  
ALLOWANCE OF ADMINISTRATIVE EXPENSE CLAIM PURSUANT TO 11 U.S.C. §  
365(d)(3) AND PAYMENT THEREOF**

PLEASE TAKE NOTICE that a hearing on the *Motion of WC Independence Center, LLC for Allowance of Administrative Expense Claim Pursuant to 11 U.S.C. § 365(d)(3) and Payment Thereof* (the “Motion”) filed by WC Independence Center, LLC (hereinafter, “Independence Center”), will be held before the Honorable Robert D. Drain, United States

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SRC Sparrow 1 LLC (None); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); SRC Sparrow 2 LLC (None); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); SRC O.P. LLC (None); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); SRC Facilities LLC (None); and SRC Real Estate (TX), LLC (None). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 118, 300 Quarropas Street, White Plains, New York 10601-4140 (the “Bankruptcy Court”), on **March 21, 2019 at 10:00 am (ET)** (the “Hearing”)

**PLEASE TAKE FURTHER NOTICE** that any objections to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Bankruptcy Court, shall be filed with the Bankruptcy Court, and shall be served in accordance with the *Amended Order Implementing Certain Notice and Case Management Procedures* (Dkt. No. 405) (the “Amended Case Management Order”), so as to be filed and received no later than **March 15, 2019 at 4:00 pm (ET)** (the “Objection Deadline”).

**PLEASE TAKE FURTHER NOTICE** that if an objection to the Motion is not filed and served by the Objection Deadline, the relief requested shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing pursuant to the Amended Case Management Order.

**PLEASE TAKE FURTHER NOTICE** that any objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted upon default.

Dated: February 13, 2019

Respectfully submitted,

By: /s/ Marshall C. Turner  
Marshall C. Turner

**HUSCH BLACKWELL LLP**  
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St. Louis, MO 63105-3433  
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Marshall.Turner@huschblackwell.com

**ATTORNEYS FOR WC INDEPENDENCE  
CENTER, LLC**

**CERTIFICATE OF SERVICE**

I, Marshall Turner, Esquire, do hereby certify that, on this 13th day of February, 2019, I caused a true and correct copy of the foregoing *Notice of Hearing on Motion of WC Independence Center, LLC for Allowance of Administrative Expense Claim Pursuant to 11 U.S.C. § 365(d)(3) and Payment Thereof* (the “WC Motion”) to be served electronically and by email upon all those identified in the Master Service List as of February 1, 2018, in accordance with this Court’s *Amended Order Implementing Certain Notice and Case Management Procedures* (the “Case Management Order”) entered on November 1, 2018 [Docket No. 405]. I hereby further certify that pursuant to the Case Management Order, hard copies of the foregoing WC Motion were delivered via overnight mail to (i) the Honorable Robert D. Drain, and (ii) the Office of the United States Trustee.

/s/ Marshall C. Turner  
Marshall C. Turner